UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE LIBOR-BASED FINANCIAL INSTRUMENTS ANTITRUST LITIGATION)) —)))	MDL No. 2262 Master File No. 1:11-md-02262-NRB ECF Case
THIS DOCUMENT RELATES TO: Case No. 12-CV-1025 (NRB)		

BONDHOLDER PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR APPROVAL OF NOTICE PROGRAM AND PRELIMINARY APPROVAL OF PLAN OF ALLOCATION FOR SETTLEMENTS WITH BARCLAYS BANK PLC, UBS AG, AND HSBC BANK PLC

TO: ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD

PLEASE TAKE NOTICE that, on a date and at a time to be determined by the Court, at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York 10007, in the Courtroom of the Honorable Naomi Reice Buchwald, Plaintiffs Ellen Gelboim and Linda Zacher ("Bondholder Plaintiffs") will, and hereby do, move the Court, pursuant to Federal Rule of Civil Procedure 23(e), for: (i) approval of the Notice Program to members of the Bondholder Settlement Class in connection with the settlements ("Settlements") reached between Bondholder Plaintiffs and, respectively, defendants Barclays Bank plc, UBS AG, and HSBC Bank plc in the above-captioned action; and (ii) preliminary approval of a Plan of Allocation of the aggregate net settlement fund from the Settlements.

Submitted herewith in support of Bondholder Plaintiffs' motion are: (i) a memorandum in support of the motion; (ii) the joint declaration of Karen L. Morris and Robert S. Kitchenoff in support of the motion; (iii) the declaration of Stephen J. Cirami of The Garden City Group LLC,

the Claims Administrator for the Settlements; and (iv) Bondholder Plaintiffs' proposed form of order granting the relief sought in this motion.

September 22, 2017

/s Karen L. Morris

Karen L. Morris (Bar No. 1939701)
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/s David H. Weinstein

David H. Weinstein Robert S. Kitchenoff WEINSTEIN KITCHENOFF & ASHER LLC 100 South Broad Street, Suite 705 Philadelphia, PA 19110 Tel: (215) 545-7200 Fax: (215) 545-6535

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Attorneys for Plaintiffs Ellen Gelboim and Linda Zacher

Of Counsel: Thomas C. Goldstein Eric F. Citron Goldstein & Russell, P.C. 7475 Wisconsin Avenue, Suite 850 Bethesda, MD 20814 (202) 362-0636 **CERTIFICATION OF SERVICE**

I hereby certify that on September 22, 2017, I caused the foregoing to be electronically filed with

the Clerk of the Court using the CM/ECF system, which will send notification of such filing to

the email addresses denoted on the Electronic Mail Notice List. I certify under penalty of

perjury under the laws of the United States of America that the foregoing is true and accurate.

/s/ Patrick F. Morris

PATRICK F. MORRIS

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